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EJ ANALYSIS MAP



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 21 1998

REPLY TO THE ATTENTION OF

MEMORANDUM

SUBJECT: ACTION MEMORANDUM - Request for an Emergency Removal Action at Addison Street Trailer Site, Franklin Park, Cook County, Illinois, (Site ID #B594)

FROM: Verneta Simon, On-Scene Coordinator
Emergency Response Section III

TO: William E. Muno, Director
Superfund Division

THRU: Richard C. Karl, Chief *R. Karl*
Emergency Response Branch

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval to expend up to \$72,280 to abate a threat to public health and the environment posed by an abandoned trailer left on a street in Franklin Park, Cook County, Illinois (hereinafter called the Addison Street Trailer Site). This memorandum also confirms and documents the verbal authorization of \$50,000, which the Acting Chief of the Emergency Response Branch approved on November 19, 1998, for this response action. This emergency response action involved relocating all drums, pails, and other containers (approximately 200) from the abandoned trailer and securing them on other property owned by the City of Franklin Park so that hazard characterization could be safely performed. This activity was necessary because the semi-trailer was in a busy commercial area of the city with a broken axle; therefore, making it impossible to move the trailer from the busy street. Many containers were not labeled, while some of those labeled flammable did not have Material Safety Data Sheets available for U.S. EPA use. More importantly, the semi-truck was unlocked, did not have license plates or DOT shipping placards. On December 4, 1998, all drums, pails, and other containers were transported to either the Trade Waste Incinerator in Sauget, Illinois or Environmental Services of America in South Bend, Indiana.

The emergency response action eliminated an accident because the semi-trailer was abandoned, without placards and locks, on a street in an active commercial area. An inventory of the semi-trailer is as follows: 52 black 5-gallon pails labeled flammable and "Fiberbond contains styrene", 52 gray pails labeled flammable and "Fiber-trench, Inc. resin solution contains styrene monomer", 34 55-gallon drums, 68 bags of a granular material labeled phenolic resin, and 32 ½-liter bottles labeled flammable and methyl ethyl ketone peroxide. Analytical results later confirmed that the inventory was ignitable and reactive waste. This response action was performed under Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

This site is not on the National Priorities List.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID #

A. Site Description

1. Background

On November 17, 1998, the Illinois Environmental Protection Agency (IEPA) requested U.S. EPA's assistance in mitigating an abandoned semi-trailer in Franklin Park, Illinois. U.S. EPA and the Superfund Technical Assessment and Response Team (START) went to Franklin Park and found an abandoned 48-foot trailer filled with drums, pails, bottles, and bags on a busy local street. START made a confined space entry, which resulted in the trailer being deemed an emergency removal because shipping labels suggested the presence of hazardous waste. Specifically, there were DOT flammable labels on some pails with the words, "contains styrene or styrene monomer" was also on some pails, and 32 bottles were labeled "methyl ethyl ketone peroxide." Results from one of the samples collected from the trailer demonstrated the RCRA characteristic of ignitability, because the flashpoint was 120°F. RCRA ignitable wastes are generally those with a flashpoint of less than 140°F.

2. Physical location

The abandoned trailer was found on the south side of the street at the address 11333 Addison Street in Franklin Park, Cook County, Illinois. Geographical coordinates for this location are latitude 41°56'56"N and longitude 87°54'54"W. On November 19, U.S. EPA received an exemption from the IEPA to move the contents from the abandoned trailer to the city-owned salt lot near Franklin and Edgington Streets. The salt lot was selected because it was fenced and could be regularly monitored by the police.

3. Site Characteristics

As mentioned earlier, this site was originally on a local street in a busy commercial area of Franklin Park. According to the attached environmental justice analysis (Attachment III), residents closest to the site reside in census tract #811701, block group #1. Demographics for residents in this census block group are 21% low income and <3% minority. The percentages in the State of Illinois for both low income and minority are 27% and 25%, respectively, and exceeding one of these values by two times would cause the site to be a high priority environmental justice community. The site, therefore, is considered a low priority community because the low income and minority percentages are lower than the Illinois Statewide percentages of 27% low income and 25% minority.

4. Release of threatened release into the environment of a hazardous substance, or pollutant, or contaminant

On November 17, 1998, Mr. Ed Osowski of IEPA called to notify U.S. EPA of the abandoned trailer. During this telephone call on November 17, Mr. Osowski also requested that U.S. EPA respond to the scene since drums and pails were visible.

5. NPL status

This site is neither on nor proposed for listing on the National Priorities List.

B. Other Actions to Date

1. Previous Actions

Before START entered the trailer, the Franklin Park Fire Department had removed the nonhazardous debris from the trailer such as floor tiles, metal racks, etc. This action expedited the response so that once START was dressed out in Level B response gear, they could immediately enter the trailer.

2. Current Actions

Beginning on December 4, 1998, U.S. EPA commenced its cost recovery efforts.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions observed at the Addison Street Trailer posed a threat to public health and the environment and met the criteria for a removal action as stated in the National Contingency Plan (NCP), 40 CFR § 300.415 (b)(2), specifically:

A) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;

Materials exhibiting RCRA hazardous waste characteristics of ignitability and/or reactivity have been identified in drums, pails, and other containers in the trailer. An ignitable waste is any liquid which exhibits a flash point of less than 140°F. The characteristic of reactivity is when the waste has any of the following properties: (1) It is normally unstable and readily undergoes violent change without detonating. (2) It reacts violently with water. (3) It forms potentially explosive mixtures with water. (4) When mixed with water, it generates toxic gases, vapors or fumes in quantity sufficient to present a danger to human health or the environment. (5) It is a cyanide or sulfide bearing waste which, when exposed to pH conditions between 2 and 12.5 can generate toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health and the environment. (6) It is capable of detonation or explosive decomposition or reaction at standard temperature and pressure. (7) It is a forbidden explosive as defined in 49 CFR 173.51, or a Class A explosive as defined in 49 CFR 173.53 or a Class B explosive as defined in 49 CFR 173.88. Thirty-two bottles were labeled "methyl ethyl ketone peroxide", which was sampled and found to have a flash point of 120° F. Also, methyl ethyl ketone peroxide is part of the chemical family, Organic Peroxides. Organic Peroxides are commonly highly exothermic, highly reactive, strong oxidizing agents, and highly toxic because of their chemical reactivity. Their flammable and explosive properties are similar to nitro explosives because they carry their own oxygen and are therefore potential explosives. Organic Peroxides are also shock and friction sensitive. Another example would be the pails labeled "Fiber-trench contains styrene monomer" and "Fiberbond contains styrene." Styrene and styrene monomer are the same chemical. Styrene monomer is the commercial name for the chemical. According to the National Institute for Occupational Safety and Health (NIOSH) , styrene has a flash point of 87° F. Therefore, the pails of "Fiber-trench" and "Fiberbond" are ignitable.

B) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release;

A total of 238 containers, which were either in drums, bags, pails, or ½ liter plastic bottles, were found in the abandoned trailer. When the containers were moved from 11333 Addison Street to the Franklin Park salt yard, U.S. EPA discovered that some containers were in poor condition and an unknown liquid was leaking along the south side of the trailer. It was necessary to apply absorbents outside the trailer and overpack two 55-gallon drums. Once all items were taken out of the trailer, the trailer was decontaminated.

C) Threat of fire or explosion;

The threat of fire and explosion was present at this site because these wastes could be classified as RCRA ignitable and/or reactive.

E) The unavailability of other appropriate Federal or State response mechanism to respond to the release.

On November 17, Mr. Osowski of IEPA called to notify U.S. EPA of the abandoned trailer and requested U.S. EPA's assistance.

IV. ENDANGERMENT DETERMINATION

Given the site conditions, the nature of hazardous substances on-site, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response action selected in this Action Memorandum may have resulted in an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

The response actions described in this Action Memorandum directly addressed potential releases of ignitable and reactive waste which posed a threat to public health and the environment. Emergency response activities at the site included: developing a health and safety plan, relocating the contents of the trailer, sampling the contents of the trailer, decontaminating the abandoned trailer, and arranging disposal of the contents.

Emergency response activities under this Action Memorandum required approximately 5 on-site working days. The threats posed by identified hazardous waste materials met the criteria listed in 40 CFR § 300.415(b)(2) of the NCP and were consistent with the removal action performed. Furthermore, no post-removal controls were necessary.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants, or contaminants at the site which posed an imminent and substantial endangerment to public health and safety and the environment. These response actions did not impose a burden on the affected property disproportionate to the extent to which that property contributed to the conditions being addressed.

The detailed cleanup contractor costs are presented in Attachment I and estimated project costs are summarized below:

REMOVAL PROJECT CEILING ESTIMATE

EXTRAMURAL COSTS:

Cleanup Contractor Costs	\$ 50,000
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Contingency (0%)	- 0 -
Subtotal	\$ 50,000
Total START	12,500
Extramural Subtotal	<u>\$ 62,500</u>
Extramural Contingency (0%)	- 0 -
TOTAL, EXTRAMURAL COSTS	<u>\$ 62,500</u>
<u>INTRAMURAL COSTS:</u>	
U.S. EPA Direct Costs	
\$30 x (60 Regional hours plus 6 HQ hours)	\$ 1,980
U.S. EPA Indirect Costs	
(\$65 x 60 Regional hours)	<u>\$ 3,900</u>
TOTAL, INTRAMURAL COSTS	\$ 9,780
TOTAL REMOVAL PROJECT CEILING ESTIMATE:	\$ 72,280

All applicable or relevant and appropriate requirements (ARARs) were complied with to the extent practicable.

Emergency response activities performed pursuant to this Action Memorandum were, to the extent practicable considering the exigencies of the situation, consistent with ARARs identified by the IEPA. The OSC has been in coordination with Mr. Don Klopke, Mr. Ed Osowski, and Mr. Scott Owens of IEPA, concerning this site.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed or non-action could have resulted in the abandoned trailer remaining on the street in the active commercial area. Potential release of the hazardous substances could have occurred as a result of a vehicular accident or chemical reaction.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in an Enforcement Confidential Addendum.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Addison Street Trailer Site, Franklin Park, Cook County, Illinois, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the site. Conditions at the site meet the NCP, 40 CFR § 300.415 (b) (2) criteria for a removal and I recommend your approval of this emergency removal action. The total project ceiling, if approved, will be \$ 72,280. Of this, an estimated \$50,000 may be used for cleanup contractor costs. You may indicate your decision by signing below.

APPROVAL:  DATE: 12-21-98
Superfund Division Director

DISAPPROVAL: _____ DATE: _____
Superfund Division Director

Confidential Enforcement Addendum

Attachments

- I. Cleanup Contractor Cost Estimate
- II. Index of the Administrative Record
- III. Environmental Justice Analysis

cc: Kevin Mould, U.S. EPA HQ, 5202G
Mike Chezick, U.S. Department of Interior, w/o Enf. Addendum
Ed Osowski, Illinois Environmental Protection Agency, w/o Enf. Addendum
Mary Gade, Illinois Environmental Protection Agency, w/o Enf. Addendum
Steve Davis, Illinois Department of Natural Resources, w/o Enf. Addendum

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REDACTED

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

**ENFORCEMENT ADDENDUM
ADDISON STREET TRAILER SITE
FRANKLIN PARK, ILLINOIS
DECEMBER, 1998
1 PAGE**

REDACTED

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

ATTACHMENT I

**INDEPENDENT GOVERNMENT COST ESTIMATE
ADDISON STREET TRAILER SITE
FRANKLIN PARK, ILLINOIS
DECEMBER, 1998
1 PAGE**

REDACTED

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

ATTACHMENT II
U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

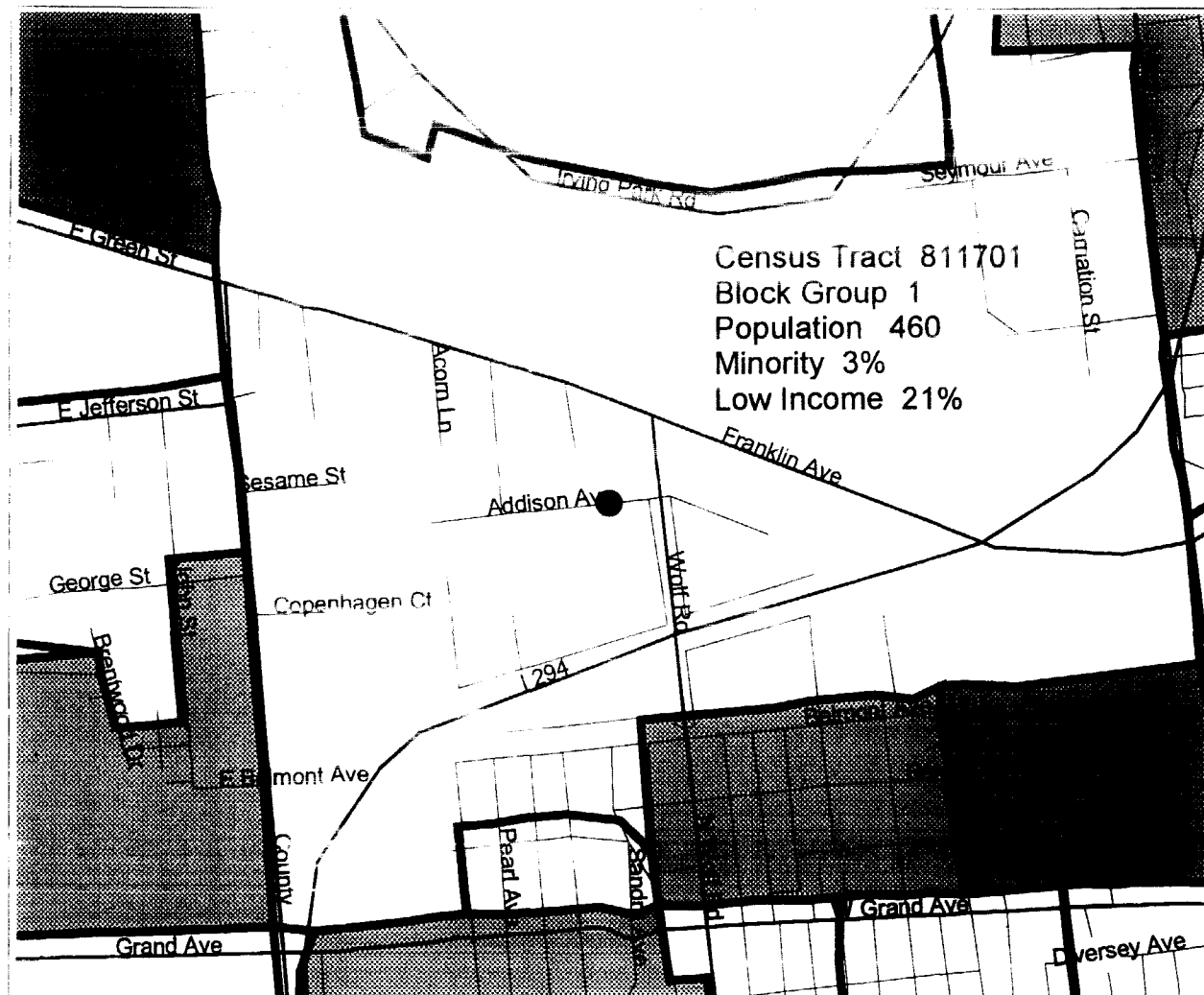
ADMINISTRATIVE RECORD
FOR
ADDISON STREET TRAILER SITE
FRANKLIN PARK, COOK COUNTY, ILLINOIS

ORIGINAL
DECEMBER 16, 1998

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	11/17/98	National Response Center	U.S. EPA/ Region 5	FAX Transmission re: NRC Incident Report Concerning the Addison Street Trailer Site	2
2	11/19/98	Owens, S., IEPA	Simon, V., U.S. EPA	FAX Transmission re: IEPA's Exemption to U.S. EPA from the Manifesting festing/Special Waste Hauling Permitting for Wastes Generated from the Emergency Response Activities at the Addison Street Trailer Site	2
3	00/00/00	Simon, V., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum: Request for an Emergency Removal Action at the Addison Street Trailer Site (PENDING)	

Region 5 Superfund EJ Analysis

Addison St. Trailer Site, Franklin Park, IL

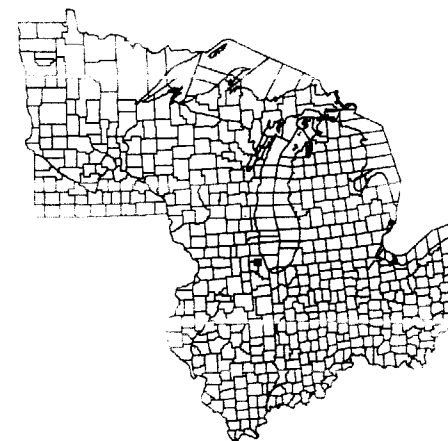


EJ Identification

- Low Income and Minority Less than State Average
- Low Income or Minority at or Greater than State Average
- Low Income or Minority 2 Times or Greater than State Average (meets Region 5 EJ Case criteria)

● Site Location

Region 5 EJ Case Criteria for Illinois
Minority: 50% or greater
Low Income: 54% or greater



0.5 0 0.5 1 Miles

U.S. EPA Region 5
Superfund

Date of Map: 12/2/96

Source of Map: 1990 Census Database